

**IN THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT  
OF TEXAS FORT WORTH DIVISION**

<b>EUGENIO VARGAS,</b>	§	
	§	
	§	<b>Civil Action No. 4:22-cv-403-Y</b>
<b>Plaintiff/Counterclaim</b>	§	
<b>Defendant,</b>	§	<b>Judge Terry R. Means</b>
	§	
<b>v.</b>	§	
	§	
<b>ASSOCIATION OF PROFESSIONAL</b>	§	
<b>FLIGHT ATTENDANTS, <i>et al.</i>,</b>	§	
	§	
<b>Defendants/Counterclaim</b>		
<b>Plaintiff.</b>		

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**PLAINTIFF’S MOTION TO COMPEL DEFENDANTS’  
PRODUCTION OF DOCUMENTS**

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Now comes the Plaintiff, EUGENIO VARGAS (hereinafter “Plaintiff” or “Vargas”), by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 34, 37, and Local Rules 5.2 and 7.1 and files his Motion to Compel Defendants ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS (hereinafter “APFA”), Julie Hedrick and Erik Harris (collectively referred to as “Defendants”) Production of Documents and withdraw objections to Plaintiff’s requests for production and produce whatever documents may be in Defendants’ possession or subject to its control that are responsive to Plaintiff’s First Amended First Request for Production served upon Defendant in this cause and in support thereof would respectfully show as follows:

**II. FACTS**

Plaintiff served Defendants with PLAINTIFF/COUNTERCLAIM DEFENDANT  
FIRST AMENDED FIRST REQUEST FOR PRODUCTION TO

DEFENDANTS/COUNTERCLAIM PLAINTIFF on July 29, 2022. Defendants responded to Plaintiff's First Amended First Request for Production, via email on August 26, 2022.

Defendants' Responses to Plaintiff's Requests for Production are attached hereto in Plaintiff's Appendix to Motion to Compel and are incorporated herein by this reference for all purposes. (*See App. Pgs. 1-30*). Defendants objected to Plaintiff's Requests for Production No.'s 1, 2, and 3. All of the requests by Plaintiff in the Requests for Production are necessary to enable Plaintiff to prepare for trial in this cause. Defendants' objections have no merit. Plaintiff is seeking an order from this Court ruling the objections should be withdrawn and the Requests properly answered by Defendants.

Without the documents requested, Plaintiff will not be able to effectively prove his claims at trial.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays as follows:

1. That Defendants be ordered to withdraw their objections to Plaintiff's First Amended First Amended First Request for Production and to produce all of the requested documents in Defendants' possession or subject to their control that are responsive to Plaintiff's First Amended First Request for Production.
2. Movant be awarded such other and further relief, legal or equitable, which Movant may show itself justly entitled to receive.

Respectfully submitted,  
K.D. PHILLIPS LAW FIRM, PLLC

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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that on September 5, 2023, a true and correct copy of the above was served on Defendants' attorneys, via the e-filing manager.

/S/ Kerri Phillips  
Kerri Phillips

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